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cc:

Subject: vb/l70

Based on Ginny's comment at today's briefing, I think it's important to clarify EPA's understanding of the role of the citizens who participate in our working group. When we established the working group in 1998, we spent some time developing procedural guidelines and a purpose statement. These are written and are part of the record.

While we invited someone from every neighborhood to participate in the working group, some citizens were not comfortable claiming to represent any other view but their own individual view. EPA acknowledged this concern and assured the participants that there was no expectation that citizens who participate represent anyone but themselves.

This is documented in the procedural guidelines. The language is, "each member of the working group is expected to clearly articulate and represent his or her interests and may or may not represent the interests of others."

At the VB/l70 Site, EPA has a responsibility to evaluate community acceptance of various remedial alternatives by not only working with the citizens who participate in the working group but also by conducting other public outreach activities. So, at this point in time, we have not conducted enough public outreach to confidently say we know the level of community acceptance of any of the alternatives being considered. The vast majority of people who live in VB/l70 don't even know an FS has been developed.

We value and appreciate the time and effort invested by the working group members and have used their input on sampling designs, risk assessment issues, and the development of alternatives. However, we do not know how well they represent the Vb/l70 community. We won't know this until public comments are received on the proposed plan. It was never EPA's intention to evaluate community acceptance of any of our work solely through the Working Group.